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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC., et al.,

Plaintiffs,

v.

RIMINI STREET, INC., et al.,

Defendants.

CASE NO. 2:10-cv-00106-LRH-VCF

**RIMINI STREET, INC.'S MOTION
 TO SEAL PORTION OF
 DEMONSTRATIVES**

NOTICE OF MOTION AND MOTION

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 10, 2010 (ECF No. 55, “Protective Order”), Rules 5.2(e)–(f) and 26(c) of the Federal Rules of Civil Procedure, and Local Rule 10-5(b), Defendant Rimini Street, Inc. (“Rimini”) respectfully requests that the Court seal a small portion of Demonstrative #2 filed as part of Rimini’s Notice of Submission of Demonstratives.

Specifically, Demonstrative #2 contains a non-public hyperlink to an evidentiary video presentation titled “BengeDeclarationProcess2.0.mp4,” which was submitted in connection with Rimini’s Opposition to Oracle’s Motion for Order to Show Cause, and which describes Rimini’s proprietary processes. That video has been submitted to the Court previously pursuant to a Motion to Seal (ECF No. 1394), which has not yet been ruled on. Only Rimini, Oracle, and the Court have access to the unredacted link to the video.

Rimini respectfully requests that the link be sealed for the reasons stated in Rimini’s prior motion to seal (ECF No. 1394). Sealing (*i.e.*, redacting) the link is necessary because if the link is not redacted, then any member of the public can view and use the link to access the video of Rimini’s proprietary processes.

This motion to seal is narrowly tailored because the remainder of the demonstratives—other than the link—have been filed publicly without redactions.

Accordingly, Rimini respectfully requests that the Court grant leave to file under seal the portion of Demonstrative #2 (filed with Rimini’s Notice of Submission of Demonstratives) that contains a link to the video describing Rimini’s proprietary processes.

Dated: September 3, 2020

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Eric D. Vandeveld
Eric D. Vandeveld

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